UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case:2:21-cr-20537

Judge: Roberts, Victoria A.

MJ: Grand, David R.

Filed: 08-18-2021 At 12:51 PM INDI USA V. TAYLOR JR. (DA)

Plaintiff,

v.

CHARLES ROBERT TAYLOR, JR.,

Defendant.

VIO.: 18 U.S.C. § 2251(a), (e)

18 U.S.C. § 2260A

18 U.S.C. § 2252A(a)(2)

18 U.S.C. § 2252A(a)(5)(B)

Forfeiture Allegations

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Indictment, a boy, MV-1, whose identity is known to the Grand Jury, was a victim of the crimes alleged in Counts One through Four. MV-1 has a date of birth in 2009.

COUNT ONE

18 U.S.C. § 2251(a), (e) Production of Child Pornography

On or about November 26, 2020, in the Eastern District of Michigan, the defendant, CHARLES ROBERT TAYLOR, JR., attempted to and did knowingly

employ, use, persuade, induce, entice and coerce a minor, specifically, MV-1, who was under 18 years of age, to engage in any sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and in and affecting interstate and foreign commerce; all in violation of Title 18, United States Code, Section 2251(a), (e).

COUNT TWO

18 U.S.C. § 2260A Commission of a Felony Offense Involving a Minor When Required to Register as a Sex Offender

On or about November 26, 2020, in the Eastern District of Michigan, the defendant, CHARLES ROBERT TAYLOR, JR., being required by Federal and other law to register as a sex offender, did commit a felony offense involving a minor

under Title 18, United States Code, Section 2251, to wit: the felony offense alleged in Count One of this Indictment; in violation of Title 18, United States Code, Section 2260A.

COUNT THREE

18 U.S.C. § 2252A(a)(2)

Distribution of Child Pornography

On or about November 28, 2020 through on or about November 30, 2020, in the Eastern District of Michigan, the defendant, CHARLES ROBERT TAYLOR, JR., did knowingly distribute child pornography as defined in Title 18 United States Code, Section 2256(8); using a means and facility of interstate and foreign commerce, and the child pornography distributed by the defendant had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT FOUR

18 U.S.C. § 2252A(a)(5)(B) *Possession of Child Pornography*

On or about December 8, 2020, in the Eastern District of Michigan, the defendant, CHARLES ROBERT TAYLOR, JR., knowingly possessed one or more computer hard drives, cell phones, cameras, DVDs, magazines, periodicals, and other material which contained child pornography, as defined in Title 18, United States Code, Section 2256(8), including but not limited to visual depictions of a real prepubescent minor who had not attained twelve (12) years of age engaged in sexually explicit conduct, that had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce, had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means; in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATIONS

Upon conviction of any of the offenses charged in Counts One, Three, and Four of the Indictment, the defendant, CHARLES ROBERT TAYLOR, JR., shall, pursuant to 18 U.S.C. § 2253, forfeit to the United States the following:

- Any visual depiction described in 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these subsections;
- ii. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- iii. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

If any of the property described in the paragraphs above as being forfeitable pursuant to 18 U.S.C. § 2253, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

the United States of America, pursuant to 21 U.S.C. § 853(p), intends to seek forfeiture of all other property of the defendant up to the value of the above described forfeitable property.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA S. MOHSIN Acting United States Attorney

BENJAMIN C. COATS Chief, Major Crimes Unit

s/Lisandra Fernandez-Silber
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Date: August 18, 2021

United States District Court Eastern District of Michigan	Criminal Case Cover	Filed: 08-18-2021 At 40 5 -
NOTE: It is the responsibility of the Assistant U.S.	Attorney signing this form to complete	INDI USA V. TAYLOR JR. (DA) it accurately in all respects.
Gempation Case infogration		npanion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4)¹:		ge Assigned:
☐ Yes ⊠ No	AUS	A's Initials: LFS
Case Title: USA v. Charles	Robert Taylor, Jr.	
County where offense occu	ırred : Wayne	
Check One: ⊠Felony	□Misdeme	eanor
Indictment/Info	ormation no prior complain ormation based upon prior ormation based upon LCrR	
Superseding Case Informatio	on	
Superseding to Case No:		Judge:
Involves, for plea purpos	ional charges or defendants. es, different charges or adds o matter but adds the additional	counts. defendants or charges below:
Defendant name	Charges	Prior Complaint (if applicable)
Please take notice that the below	listed Assistant United S	tates Attorney is the attorney of record for
the above captioned case.	2	
August 18, 2021 Date Lisandra Fernandez-Siller Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, MI 48226-3277 Phone: 313-226-9122 Fax: 313-226-2372		States Att orné y eet, Suite 2001 26-3277 -9122 -2372
	E-Mail address: Attorney Bar #:	lisandra.fernandez-silber@usdoj.gov

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.